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September 17, 2024

VIA ECF

Hon. Andrew L. Carter Jr.
U.S. District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Request for an Extension of Time to File Plaintiff's Response to Defendants' Motion to Dismiss *Wright v. Mail Media Inc. et al.*, No. 1:23-cv-07124-ALC (S.D.N.Y.)

Dear Judge Carter:

Plaintiff Hillary Wright hereby respectfully requests this Court to amend the briefing schedule as set forth below.

This Court set a briefing schedule for Defendants' motion to dismiss and noted that the parties could propose an alternative briefing schedule. Dkt. 53. The parties submitted a joint letter proposing an alternative briefing schedule (the "Current Briefing Schedule"). Dkt. 54. This Court memo endorsed the Current Briefing Schedule. Dkt. 55. Defendants filed their Motion to Dismiss on August 16, 2024. Dkt. 56; 57.

Plaintiff's counsel respectfully requests to alter the briefing schedule as proposed below.

Current Schedule Granted in Dkt. 55	
Plaintiff's Response	September 20, 2024
Defendants' Reply	October 8, 2024

Proposed Schedule	
Plaintiff's Response	October 21, 2024
Defendants' Reply	November 15, 2024

This is Plaintiff's first extension request to file her response. Plaintiff's counsel requests this response because she has been dealing with a family emergency for the past few weeks. This

emergency has required Plaintiff's counsel to travel out of state and devote a majority of her time to her family. Plaintiff's counsel's work has been completely disrupted by this issue. Further, Plaintiff's counsel does not have a definite timeframe for when she will be able to step away from this family emergency.

On September 12, 2024, Plaintiff's counsel reached out to Defendants' counsel about altering the briefing schedule. Defendants' counsel promptly responded stating that Defendants consent to Plaintiff filing her response by October 21, 2024. Further, the Plaintiff consented to amend Defendants' deadline to file a reply brief until November 15, 2024.

For the reasons stated above, Ms. Wright hereby respectfully requests that the Court amend the briefing schedule to the Proposed Schedule listed above.

Respectfully submitted,

/s/ Megan Keenan

Megan Keenan

Attorney

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